

FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

APR 16 2025  
U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. ) No.  
 )  
AARON BROOKINS, )  
 )  
Defendant. )

4:25CR189-HEA/PLC

**INDICTMENT**

The Grand Jury charges:

**COUNT 1**

From in or about August 2011, until in or about September 2023, within the Eastern District of Missouri, the defendant,

**AARON BROOKINS,**

did embezzle, steal, purloin, and knowingly convert to his use, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: Social Security disability payments in the amount of \$93,383.40, creating a total loss to the Government in excess of \$1,000.

All in violation of Title 18, United States Code, Sections 641.

**COUNT 2**

From in or about August 2011, until in or about September 2023, within the Eastern District of Missouri, the defendant,

**AARON BROOKINS,**

having knowledge of the occurrence of an event affecting the continued right to any benefit payment from the Social Security Administration, concealed or failed to disclose such event with an intent to fraudulently secure payment when no payment was due or authorized, to wit: **AARON BROOKINS** concealed and failed to disclose his full physical abilities, and concealed and failed to disclose his work and income from a lawncare business.

In violation of Title 42, United States Code, Section 408(a)(4).

**COUNT 3**

On or about April 27, 2023, within the Eastern District of Missouri, the defendant,

**AARON BROOKINS,**

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by making a false statement on Social Security form SSA-820, titled Declaration of Self-Employment, to wit: **AARON BROOKINS** claimed he was not self-employed when, in truth and in fact and as **AARON BROOKINS** knew, **AARON BROOKINS** owned and worked at his own lawncare business, and received approximately \$5,869.33 in income the same month in which he made the statement.

In violation of Title 18, United States Code, Section 1001.

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code,

Section 641, as set forth in Count 1, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said offense. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

2. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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DIANE E. KLOCKE, #61670MO  
Special Assistant United States Attorney